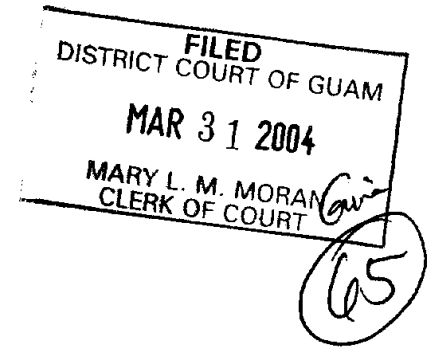


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IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)
SADHWANI, and K. SADHWANI'S)
INC., a Guam corporation,)
)
Plaintiffs,)
)
v.)
)
HONGKONG AND SHANGHAI)
BANKING CORPORATION, LTD.,)
et al.,)
Defendants.)
_____)

CIVIL CASE NO. 03-00036

**MOTION TO STAY ALL
DEPOSITIONS PENDING
DETERMINATION OF
HSBC's MOTION TO DISMISS**

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola


You are hereby advised that as soon as the matter can be heard at the District Court of Guam, 520 W. Soledad Avenue, 4th Floor, Hagåtña, Guam 96910, Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will move the Court for an Order staying all depositions pending determination of HSBC's Motion to Dismiss filed herein and taken under advisement by the Court on February 13, 2004, as more fully explained in the Memorandum of Points and Authorities contemporaneously filed herein.

The motion will be based upon this Motion, the Memorandum of Points and Authorities filed herein, the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

Dated this 31st day of March, 2004.

LAW OFFICES OF BRONZE & TANG, P.C.
Attorneys for Defendant The Hongkong and
Shanghai Banking Corporation Ltd.

By: _____


JACQUES G. BRONZE